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BY ECF

October 11, 2023

The Honorable Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

Re: *Satanic Temple v. Newsweek* (22-CV-1343) – unopposed request for a 30-day extension for fact discovery

Dear Judge Vyskocil:

Pursuant to Individual Civil Rule 2(G), Plaintiff The Satanic Temple, Inc. requests a thirty (30) day extension of the deadline to complete fact discovery to December 7, 2023. The current deadline is November 7, 2023. (ECF 43). This is the second extension requested and it is unopposed by Defendant Newsweek Digital, LLC.

To date, the parties have worked expeditiously to comply with the current discovery deadline. They have served and responded to written discovery, substantially completed exchange of their respective document productions, and met and conferred regarding party and third-party depositions. However, the parties reached an impasse regarding the scope of document productions as outlined in their letter to Magistrate Judge Cave regarding outstanding discovery disputes, filed on October 9, 2023. (ECF 53). That matter is currently before Magistrate Judge Cave and has been scheduled for hearing on October 12, 2023. (ECF 47). The parties were also unable to agree on the scope of third-party depositions and have filed memoranda on that issue (ECF 50, 51, and 52). The third-party depositions have not been scheduled yet, as the parties await the Court's resolution to that dispute.

The outstanding discovery issues will not be resolved before October 12 and the

remainder of the discovery window will be consumed by preparing for the already-scheduled depositions. Additionally, the individual who authored the subject defamatory statement has ignored my subpoena for testimony. A thirty-day window is necessary to find him and effectuate personal service.

Wherefore, Plaintiff respectfully requests a 30-day unopposed extension of time to complete fact discovery, to December 7.

Respectfully submitted,

By: /s/ Matt Kezhaya

Matt Kezhaya (*pro hac vice*)



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CERTIFICATE OF SERVICE

NOTICE IS GIVEN that I, Matt Kezhaya, efiled the foregoing document by uploading it to the Court's CM/ECF system on October 11, 2023, which sends service to registered users, including all other counsel of record in this cause.

s/ Matt Kezhaya